

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN, et al.

NO. 3:17-CR-155-L

BILL OF PARTICULARS
REGARDING PROPERTY SUBJECT TO FORFEITURE

The United States hereby provides this forfeiture notice that replaces the notice in the Superseding Indictment (Dkt. 162) and Bill of Particulars (Dkt. 339).¹

Pursuant to 18 U.S.C. § 982(a)(7), upon conviction of any offense violating 18 U.S.C. §§ 1349, 1347, and/or 2, defendants Jamshid Noryian, Dehshid Nourian, Christopher Rydberg, and Michael Taba shall forfeit to the United States of America property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the conspiracy and/or the scheme to defraud.

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense(s) violating 18 U.S.C. §§ 1349, 1347, and/or 2, the defendant(s) Jamshid Noryian, Dehshid Nourian, Christopher Rydberg, and Michael Taba shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the conspiracy and/or scheme to defraud.

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of

¹ This notice updates the superseding indictment's forfeiture notice (Dkt. 162) and bill of particulars (Dkt. 339) by: updating the descriptions of asset (i.) and asset (j.) to reflect the new financial institution and account numbers for those two assets, and provide notice that the government is seeking all funds in those accounts.

18 U.S.C. § 1956, the defendants shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

The property to be forfeited includes, but is not limited to:

- a. Real property located at 217 Bella Riva, Austin, Texas 78734;²
- b. \$229,931.68 of \$1,251,570.92 in proceeds obtained from the sale of real property located at 2525 Handley Ederville Road, Richland Hills, Texas;
- c. Real property located at 867 FM 3133, Van Alstyne, Texas 75495;
- d. \$1,815,847.21 in funds seized from Wells Fargo Bank Account XXXXXX0302 in the name of Industrial & Family Pharmacy Inc;
- e. \$27,907.62 in funds seized from JP Morgan Chase Bank Account XXXXX2280 in the name Ability Pharmacy Inc;
- f. \$70,437.93 in funds seized from JP Morgan Chase Bank Account XXXXX3462 in the name Jade and Joy Holdings LLC;
- g. \$96,924.25 in funds seized from JP Morgan Chase Bank Account XXXXXX7273 in the name Jade and Joy Holdings LLC [replaces the asset described in Superseding Indictment as “All funds or up to \$146,181.18 in JP Morgan Chase account XXXXXX7273 held in the name of Jade and Joy”];
- h. \$106,211.14 in funds seized from BancorpSouth Bank Account XXXXXX5371 in the name of Bandoola Pharmaceutical LLC [replaces the

² The full legal descriptions for the real properties have been omitted from this bill of particulars but the real properties listed are the same properties as referenced in the Superseding Indictment.

asset described in the Superseding Indictment as “All funds or up to \$107,041.49 in Bancorp South account XXXXXX5371 held in the name of Bandoola”];

- i. All funds and holdings (including appreciation and interest traceable to such funds and holdings) in Charles Schwab account ending in 5789 (formerly TD Ameritrade account ending 1944 in the name of Sherri Mofid);
- j. All funds and holdings (including appreciation and interest traceable to such funds and holdings) in Charles Schwab account ending in 4516 (formerly TD Ameritrade account ending 4516 in the name of Dehshid Nourian and Larisa Nourian); and
- k. 2016 BMW 7 Series Sedan 4D 750xi, VIN WBA7F2C58GG416750.

The government may seek a forfeiture money judgment.

The government may seek to forfeit substitute property as allowed by 21 U.S.C. § 853(p) (applicable under 18 U.S.C. § 982(b) and/or 28 U.S.C. § 2461(c)).

The government may file supplemental bills of particulars as additional assets are identified. The government also reserves its rights to election of remedies regarding the disposition of the property sought for forfeiture.

Respectfully submitted,

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